

REMARKS

Examiner has entered a new grounds for rejection, namely Claims 93-96, 98, and 101-103 are rejected under 35 U.S.C. §103 as unpatentable over a combination of four separate references— Lester as the primary reference in view of Murakami, further in view of Conley, further in view of Ochiai.

At the outset, it would appear that a combination of four separate references is itself an indication of a hindsight rejection based on Applicant's claims and not what would be obvious to combine to one skilled in the art based on a teaching, suggestion or motivation (TSM test) to combine. As pointed out below, the TSM test is not met in this case since it is not obvious to combine Murakami with Lester.

Claim 93 distinguishes in many different ways. First, Claim 93 distinguishes at least by reciting a first control unit that controls the first printer and comprises a control panel server which the at least one operating unit accesses as a client to output control data. The Examiner agrees at the bottom of page three that the primary reference Lester does not have this feature, but cites the secondary reference Murakami Fig. 3 and paragraph 299. However these portions of Murakami do not disclose a control panel server which the at least one operating unit accesses as a client to output control data. Murakami Fig. 3 only shows a printer server connected to a printer and paragraph 299 only discloses a printer server S connected to a printer 3B. But there is no disclosure of a first printer first control unit comprising a control panel server which the at least one operating unit accesses as a client to output control data.

Claim 93 next distinguishes by reciting the first printer comprises an internal network. For this the Examiner again cites Murakami Fig. 3 and paragraph 299. But Murakami Fig. 3 clearly shows that the printer server TUO is external to printer 3 as

also described in paragraph 299. Although a network interface adaptor may be inside the printer fulfilling the function of a print server, this is not relevant because the interface adaptor of a printer clearly means the printer-internal adaptor which is the interface to the printer-external network-see LAN 2 in Fig. 1. This means that the adaptor performs a print server function but teaches nothing about a printer-internal network as recited in Claim 93.

Claim 93 next distinguishes by reciting the control panel server being connected via said internal network with a network agent via which a data exchange takes place with a plurality of sub-controllers of said first printer. For this the Examiner again cites the same Murakami Fig. 3 and paragraph 299. However the print server of Murakami is either external to the printer or integrated into the network interface of the printer. But this clearly does not meet the claim language of a control panel server being connected via an internal network with the network agent via which a data exchange takes place with a plurality of sub-controllers. Nothing like this is disclosed in Fig. 3 or paragraph 299 of Murakami.

Next Claim 93 distinguishes by reciting at least one second control unit in the second printer which controls a plurality of sub-controllers of said second printer. For this the Examiner again cites the same Murakami Fig. 3 and paragraph 299 only disclosing a printer server and a printer. The Fig. 3 and paragraph 299 disclosure of Murakami is clearly restricted to one single printer, whereas Claim 93 refers to a second control unit of a second printer. Clearly, Murakami fails on this point.

Claim 93 next distinguishes by reciting the at least one operating unit outputting the control data in addition to the operating information, the control data being useful to set system parameters of the second printer. For this feature the Examiner cites Lester paragraph 45 and Fig. 2. Here Lester discloses information

on the state of other printers on the network so the printers on the network are capable of determining the status of other printers on the network. Paragraph 45 discloses that any printer can determine the status of any other printer on the network wherein using status information, a first printer determines a buddy printer to redirect a print job where the first printer is in the not ready state. But there is no disclosure of the recitation of Claim 93 that the at least one operating unit is outputting the control data in addition to the operating information where that control data is useful to set system parameters of the second printer. Thus there are two kinds of information recited and Lester clearly does not disclose this at paragraph 45. Furthermore, it is the at least one operating unit which is outputting the control data in addition to the operating information in Claim 93. Lester at paragraph 45 does not discuss about printer-internal control devices at all. He only talks about data objects (printer machine language), PML objects and printer job language (PML objects) which are used for communication between a first printer and the buddy printer. This is not a disclosure to provide an operating unit which outputs both the control data in addition to the operating information.

Claim 93 next distinguishes by reciting that the control data which is output in addition to the operating information is useful to set system parameters of the second printer. For this the Examiner cites Fig. 2 and Lester paragraph 45. But there is no disclosure in Lester paragraph 45 to provide an operating unit by which the system parameters can be set. Instead Lester only discloses exchange of print data and status data between the printers. This is clearly different than setting parameters by an operating unit for input and output of operating information.

Lester was cited for its disclosure of a printer and a buddy printer (thus two printers). The Examiner is combining Murakami with Lester. But Murakami only

deals with a print server and a printer. Therefore there is no teaching, suggestion or motivation in Murakami to combine it with Lester relating to two printers.

The other two references cited by the Examiner, namely Ochiai and Conley, were cited for other features and therefore do not solve the deficiencies noted above in the combination of Lester and Murakami.

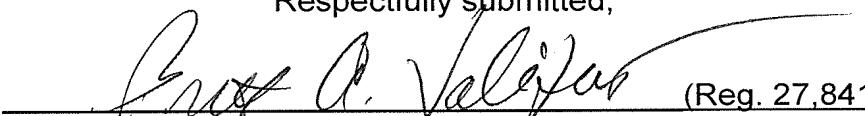
Dependent Claims 94-102 distinguish at least for the reasons noted with respect to Claim 93 and also by reciting additional features not suggested.

Method Claim 103 distinguishes at least for the reasons noted with respect to Claim 93 since the method steps recited are all discussed above in the system claim 93.

Allowance of the application is respectfully requested.

The Commissioner is hereby authorized to charge any additional fees which may be required, or to credit any overpayment to account No. 501519.

Respectfully submitted,


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